

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG
CORPORATION, *et al.*

Defendants.

Civil Action No. 3:17-01362

CABELL COUNTY COMMISSION,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG
CORPORATION, *et al.*

Defendants.

Civil Action No. 3:17-01665

**DEFENDANTS' MOTION FOR ENTRY OF COVID-19
IN-PERSON AND REMOTE DEPOSITION PROTOCOLS**

Pursuant to Rules 16, 26, and 30 of the Federal Rules of Civil Procedure, Defendants hereby move for an order entering Defendants' proposed COVID-19 in-person and remote deposition protocols.

Defendants' motion should be granted for the reasons set forth in the accompanying memorandum of law, which is incorporated here. Pursuant to LR Civ P 7.1(a), copies of all documents, affidavits, and other such materials or exhibits referenced in the memorandum and upon which this motion relies are attached to this motion. Defendants further certify that they have conferred with counsel for Plaintiffs in an effort to resolve the subject discovery dispute without court intervention.

Dated: June 9, 2020

Respectfully Submitted,

McKesson Corporation

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 9th day of June, 2020, the foregoing **“Defendants’ Motion for Entry of COVID-19 In-Person and Remote Deposition Protocols”** was served using the Court’s CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Jeffrey M. Wakefield
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